

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,	:	CRIMINAL NO. 05-170 (RJL)
	:	
V.	:	
	:	
CLIFTON RAY GORHAM,	:	
Defendant.	:	

GOVERNMENT'S MOTION TO CONTINUE MOTIONS HEARING

The United States, by and through its attorney, the United States Attorney for the District of Columbia, respectfully submits the following motion to continue the motions hearing date in the above-captioned case for the following reasons:

1. The motions hearing in the above-captioned case is currently set for Wednesday, March 1, 2006, at 10:30 a.m..
2. Undersigned counsel for the government has learned today that the primary officer who would testify at any motions hearing is currently out of the country on a previously scheduled vacation and he will not return until March 5, 2006.
3. Moreover, undersigned counsel for the government has recently been assigned to handle the prosecution in this matter and would need further time to properly prepare for the hearing.
4. Consequently, undersigned counsel for the government would request a continuance to prepare the officer, when he returns, for his upcoming testimony and to prepare this case for the motions hearing.
5. Counsel for the government has called counsel for the above-mentioned defendant. Counsel for the defendant has indicated that he does oppose the government request.

6. Undersigned counsel for the government requests, if possible with the Court's schedule, that a new motion date be scheduled within the next 2-3 weeks.

Respectfully submitted,

KENNETH L. WAINSTEIN
UNITED STATES ATTORNEY

/s/
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